

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

William G. Wright, Esquire
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America, LLC

In Re:

Bed Bath & Beyond, Inc. et al,

Debtors.

Case No.: 23-13359-VFP

Chapter 11

Judge: Hon. Vincent F. Papalia

**ENTRY OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS, AND
RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for **ARC International North America, LLC**, a creditor and party in interest, and under, *inter alia*, Bankruptcy Rules 2002, 9007, 9010 and section 1109(b) of the Bankruptcy Code, 11 U.S.C. §1109(b), requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon:

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PLEASE TAKE FURTHER NOTICE that under section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether

written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, or otherwise (1) that affects or seeks to affect any way any rights or interests of any creditor or party in interest in this case, including **ARC International North America, LLC** with respect to: (a) the debtor: (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by **ARC International North America, LLC**.

PLEASE TAKE FURTHER NOTICE that **ARC International North America, LLC** intends that neither this Entry of Appearance nor any later appearance, pleading, paper, claim, or suit shall waive (1) the right of **ARC International North America, LLC** to have final orders in non-core matters entered only after de novo review by a District Judge; (2) the right of **ARC International North America, LLC** to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right of **ARC International North America, LLC** to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which **ARC International North America, LLC** is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, set-offs, and recoupments are expressly reserved.

Dated: April 24, 2023

/s/ William G. Wright
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